

EXHIBIT 15

1 UNITED STATES DISTRICT COURT

2 WESTERN DISTRICT OF NEW YORK

3 -----
4 **BLACK LOVE RESISTS IN THE RUST, ET AL.,**
5 **INDIVIDUALLY AND ON BEHALF OF A CLASS OF**
6 **ALL OTHERS SIMILARLY SITUATED,**

7 Plaintiffs,

8 -vs-

1:18-cv-00719-CCR

9 **CITY OF BUFFALO, N.Y., ET AL.,**

10 Defendants.
11 -----

12 **EXAMINATION BEFORE TRIAL**

13 **OF BYRON LOCKWOOD**

14 **APPEARING REMOTELY FROM**

15 **BUFFALO, NEW YORK**

16
17 August 10, 2023

18 At 11:00 a.m.

19 Pursuant to notice
20

21 REPORTED BY:

22 Rebecca L. DiBello, RPR, CSR(NY)

23 APPEARING REMOTELY FROM ERIE COUNTY, NEW YORK

DEPAOLO CROSBY REPORTING SERVICES, INC.

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R E M O T E A P P E A R A N C E S

APPEARING FOR THE PLAINTIFFS, BLACK LOVE
RESISTS IN THE RUST, ET AL., INDIVIDUALLY AND
ON BEHALF OF A CLASS OF ALL OTHERS SIMILARLY
SITUATED:

**NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE**
BY: CLAUDIA WILNER, ESQ.
275 Seventh Avenue, Suite 1506
New York, New York 10001
(212) 633-6967

APPEARING FOR THE DEFENDANTS, **CITY OF BUFFALO,
N.Y., et al.:**

HODGSON RUSS LLP
BY: PETER SAHASRABUDHE, ESQ.
And HUGH RUSS, ESQ.,
140 Pearl Street
Buffalo, New York 14202
(716) 848-1508

ALSO PRESENT: Cheyenne Freeley, Hodgson Russ
Anjana Malhotra

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—BYRON LOCKWOOD—

1 was and I'm just trying to gather the
2 timeframe.

3 Q. Would it be unlawful to pull somebody over for
4 a pretextual stop because they were Black and
5 driving on the East Side and failed to signal?

6 MR. SAHASRABUDHE: Objection to form.

7 A. You have a right to pull them over if they
8 fail to signal and not because of the color of
9 their skin or of their race.

10 Q. Can an officer pull them over because of their
11 race and that they failed to signal?

12 MR. SAHASRABUDHE: Objection to form.

13 A. If he's going to pull them over I'm hoping
14 he's pulling them over because they failed to
15 signal, not because of their race.

16 Q. Well, what if the officer did pull them over
17 because of their race and they failed to
18 signal?

19 MR. SAHASRABUDHE: Objection to form.

20 Q. Is that lawful?

21 MR. SAHASRABUDHE: Objection to form.

22 A. You can pull a person over if they fail to
23 signal for the traffic, but if he just pulled

—DEPAOLO CROSBY REPORTING SERVICES, INC.—